

To

The Secretary,
Election Commission of Pakistan,
Islamabad

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4-4-18

Subject: REPRESENTATION /OBJECTIONS ON DE-LIMITATION OF
CONSTITUENCIES REGARDING PK-49 AND PK-50 UNDER CHAPTER 3
OF THE ACT 2017.

Respectfully Sheweth,

The petitioner humbly submits as under: -

1. That the applicant is a resident of District Mardan.
2. That delimitation of constituency of PK-49 and PK-50 have not been carried out as per law, rules and principles as laid down in Article 20 of Election Act 2017.
3. That PK-50 consists of Union Council falling in Tehsil Mardan while PK-49 consists of Union Council of Tehsil Katlang.
4. However, Union Council, Sawaldher having population of 35913 is part of Tehsil Mardan but has been included in PK-49 and similarly Union Councils Garyala, population 21580, and Gujarat, population 24890, which are part of Tehsil Katlang have been included in PK-50.
5. That Union Council Sawaldher cannot be approached through any major road through other Union Council of PK-49 and as such is not natural part of PK-49 but is naturally aligned with PK-50 in all aspects.
6. That if these Union Councils are switched between these two constituencies it would not only be easier for the future representatives of the areas but also would be beneficial for the residents in other respects.

It is therefore, humbly requested that the above explained amendments be made in the interest of the residents.

Dated: 02.04.2018

Petitioner through
Counsel

16101-1214396-1
Sajid Ali 3215

The voter certificate will be produced at the time of hearing. 16101-5661066-1
276

To


The Secretary,
Election Commission of Pakistan,
Islamabad.

Subject: REPRESENTATION/OBJECTIONS ON RECENT DE-LIMITATION OF NA 20, 21 AND NA 22 UNDER CHAPTER 3 OF THE ACT 2017.

Respectfully Sheweth,

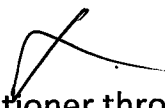
The petitioner humbly submits as under: -

1. That the applicant is a resident of District Mardan.
2. That the de-limitations of Constituency NA-20, 21 and NA-22 were carried out against election rules, and Act 2017 whereby the principles of de-limitation as laid down in Article 20 of the Election Act 2017.
3. That Mangah PC having population of 56747 which includes Union council Mangah and Khazana Dheri were historically part of NA-21 earlier designated as NA-9.
4. That similarly Mian Khan, Population 14315 and Dheri, population 32808 have remained part of NA-22.
5. That Mangah PC which is included presently in NA-22 cannot be accessed from any major road from any other part of NA-22 without passing through NA-21 i.e. First crossing Baghdada, Mardan cantonment, Union Council Bijlighar, Mardan rural, and Chamtar, this would greatly reduce rendering any services by the representatives of the Constituency, not to say that this would always be a big burden on the candidates in election campaigns.
6. That Mangah PC is also part of Tehsil Mardan while, other Union Councils of NA-22 are part of Tehsil Takht Bhai, and Tehsil Katlang.
7. That it would be in accordance with law and the ground realities, that Mangah pc be excluded from NA-22 and included in NA-21 while at the same time including Union Council Mian Khan and Dheeri in NA-22.
8. That Union Council Gumbat and Union Council Kandar both having population of 25989 and 25943 respectively, can be included in NA-20.
9. That the above correction would be in accordance with the principles laid down in the election Act and rules 2017.

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10. That the map provided by the provincial election Commission regarding the said constituencies is also incorrect as Gujar Garhi which has been included NA-21 has been shown as part of NA-22 and which is liable to be corrected.
 11. That the table of MC Mardan on top right corner of map is also factually incorrect, in that union Council Mardan Khas has been erroneously reflected as, Mardan rural.
 12. That the amended proposed map of the three constituencies is also hereby attached.

It is therefore, humbly requested that the representation of the petitioner be accepted. Any other amendment deemed fit may also be granted.

Dated: 01.04.2018



Petitioner through
Counsel